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JAN 15 1993

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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JAN 15 1993

FCC - MAIL ROOM

F.C.C.
1919 M St. NW
Washington, D.C., 20554

Subject: NPRM PR 92-235

Dear Sirs,

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I have recently become aware of a Notice of Proposed Rule Making from the F.C.C. that has caused great concern. This proposal (NPRM - PR Docket 92-235) was created by the Mobile Land Service and will cause a massive re-structuring of frequencies. While directed at C.F.R. Part 88, it will be of devastating repercussions to C.F.R. Part 95, or specifically, radio control operation.

Currently in model radio operation control we have the use of numerous frequencies in the 72.0 and 75.0 MHz bands. The typical spacing of these freq's are .020 MHz with a commercial use freq. inserted in between at a .010 MHz spacing from our freq's. Currently there generally is no problem with this spacing, however problems do occur when an " un-clean " transmitter is used. Our transmitters are required not to " splatter " (frequency must not exceed 1500 Hz from the operating freq.) and cause problems for the commercial users and they must not effect ours. With the proposed rule, this will end. The proposed rule will allow the insertion of TWO new frequencies between the R/C hobby and the commercial users.

Example:

Model Channel 12	72.030 MHz
New inserted channel	72.0325 MHz
New inserted channel	72.0375 MHz
Present commercial user	72.040 MHz

This means that between EACH MODEL FREQ. AND COMMERCIAL FREQ. THERE WILL BE TWO FREQ'S INSERTED. OR IN OTHER WORDS, BETWEEN EACH MODEL FREQ., FOUR WILL BE INSERTED. Due to the facts that these new freq's will be of a stronger power and mobile along with the much closer separation (2.5 kHz), they will swamp any control use of the currently existing user.

At this time in Fairbanks we have approximately 100 people flying radio control aircraft, 500 or 600 in Alaska, with considerably more operating radio control cars and boats. Considering the insolation of Fairbanks and ALaska, this is a significant number and illustrated that in the Lower Forty Eight, there are users numbering in the high tens of thousands. The commercial operators must be a like number.

The cost of changing the frequencies for all the current users

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would be high and complicated. Possibly to high and complicated for it to occur for all users. While I can not speak for the commercial users, however I would estimate that they have thousands of dollars tied up in the systems using this Radio Service. Speaking for the radio control modeler, I can state that they have from as little as a few hundred dollars to many thousands. I am currently building one model that will be worth an estimated \$2500.00 when I finish building it and get it in the air. I will not be a happy camper if it gets shot down by some one driving by on the highway, getting instructions to pick up a loaf of bread on the way home! .

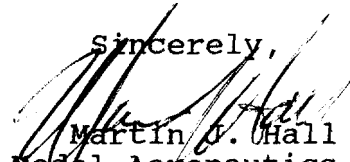
Both in realm of radio control and the commercial user, there is a real danger if these freq's are interfered with. The weights of our models run some where in the area of 10 to 16 lbs with the weight going as high as 75 lbs in some models. Speeds of 150 MPH are not unheard of, however the average speed is some where around 70 to 90 MPH. A 10 lbs. plane at 80 MPH is not something you would want to hit you or your car or your home, let alone a child. Our models are capable in inflecting serious injury and even death. In addition to the people associated with some national organization (Approximately 30 % of the model users.), there are un-told thousands that will not get the word. The national organizations are all ready warning us to the problem.

The commercial users use these freq's for many and varied uses, including the radio control of over head cranes. The National Guard at Eielson A.F.B. is one users that would not be happy if they were lifting a heavy air craft component and it was dropped due to proposed new service.

Your support prior to Feb. 26, 1993 in assisting to negating this proposed rule is requested. It is not in the best interest of those current users of the radio service as it will prove to be costly for a large number of people and will set up a dangerous situation for the radio control of models and commercial users.

Thank you for your time and support,

Sincerely,



Martin J. Hall

Academy of Model Aeronautics Leader Member
Owner Alaska Radio Control Specialties
Radio Control Modeler